

Town of Shrewsbury  
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July 15, 2020

Sheriff Roger Marcoux, Jr, Chairman  
Barbara M. Neal, Executive Director  
Vermont Enhanced 9-1-1 Board  
100 State Street, Suite 500  
Montpelier, VT 05620-6501  
[E911.info@vermont.gov](mailto:E911.info@vermont.gov)

Dear Chair Marcoux and Director Neal:

We ask you to consider these comments on your proposed rule requiring reporting of 911 telephone outages. We remain concerned about the lack of reporting and lack of knowledge about such outages ever since a two+ day outage in Shrewsbury in November 2018. A strong rule must be adopted by the Board as soon as possible so state and local officials, emergency responders, and the public are aware of and can deal with public safety threats caused by lack of emergency phone service. The proposed rule is a big step in the right direction, but we have three comments that will significantly improve it.

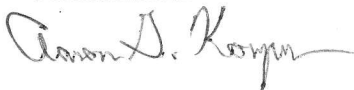
1) Do not change the reporting thresholds for facilities-based fixed voice service providers (Originating Carriers, OC's in your Definitions) from your earlier-proposed rule. The recent legislative mandate for Vermont's rule to wait on and incorporate a reporting rule from a larger state was only "applicable to wireless service providers". So, there is no reason to use Zip Code reporting or to raise the reporting threshold for the landline subscribers of OC's from 25 to 100. Even if you must use California standards for wireless carriers, please retain the lower community-based and 25 subscriber thresholds for OC Outages.

2) Revise the rule to ensure that the aggregate number of a carrier's subscribers whose loss of 911 service must be reported does not exceed what public safety requires in a rural town like ours. The proposed rule will allow carriers to escape reporting in cases where many people in multiple Zip Codes are affected, but the number in each Zip Code is less than 100. In Shrewsbury (population 1,056), we have two Zip Codes and two OC's. Other towns, small and large, will have many more carriers and Zips. A town with five Zips could have 495 people, 99 in each, out of 911 service and no reports filed.

3) Do not invite carriers to "mark information" in their reports that they believe should be exempt from public disclosure. Instead, require them when submitting reports to cite the specific information in the report that they ask be exempt and state clearly why they claim that this information is covered by a cited exemption provision of the Public Records Act. The reporting requirements of the rule are really very minimal (Sec. 4.1.2 for OC's and Sec 4.2.2 for CMRS's). How could any of the listed items be a competitive or security secret? If there were a proprietary technology or vulnerability truly at risk due to disclosure, we do not see this as required by any of the reporting requirements of the proposed rule.

Thank you for your work at the Board and for considering these comments.

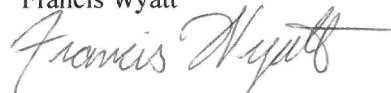
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